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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91176139
Party	Plaintiff V&V Supremo Foods, Inc.
Correspondence Address	Thomas M. Williams Brinks Hofer Gilson & Lione P.O. Box 10395 Chicago, IL 60610 UNITED STATES officeactions@usebrinks.com
Submission	Motion for Sanctions
Filer's Name	Thomas M. Williams
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Date	01/15/2008
Attachments	12005-00151OpposersMotionforJudgment.pdf ( 3 pages )(86059 bytes )

V&V SUPREMO FOODS, INC.	)	
	)	
Opposer,	)	
	)	
v.	)	Opposition No. 91/176,139
	)	Application Serial No. 78/377,220
CORPORATIVE BRANDINGS and	)	Mark: RANCHERITA
INVESTMENTS, S.A. de C.V.,	)	
	)	
Applicant.	)	
	)	

Pursuant to Trademark Rule 2.120(g)(1), 37 C.F.R. § 2.120(g)(1), and the Board’s Order dated December 4, 2007, Opposer, V&V Supremo Foods, Inc. (“Opposer”), hereby files its Motion for Judgment against Applicant Corporative Brandings and Investments, S.A. de C.V. (“Applicant”).

On December 4, 2007, the Board granted Opposer's Motion to Compel Applicant's Responses to Document Requests and Interrogatories ("Motion to Compel"). This Motion to Compel was based upon Applicant's failure to respond, object, or otherwise reply to Opposer's discovery requests. The Board's December 4 Order, among other things, allowed Applicant forty days to serve responses to Opposer's first set of interrogatories and first set of document requests. As of the filing date of this Motion, Applicant has failed to respond. The Board's December 4 Order stated, "If applicant fails to fully comply with this order, [Opposer's] remedy lies in a motion for judgment pursuant to Trademark Rule 2.120(g)(1)."

Based on the foregoing, Opposer respectfully requests the Board to enter judgment against Applicant and refuse registration of the RANCHERITA mark (Ser. No. 78/377,220). See T.B.M.P. § 411.04; Fed. R. Civ. Proc. 37(b)(2)(A)(vi); *Baron Philippe de Rothschild S.A. v. Styl-Rite Optical Mfg. Co.*, 55 U.S.P.Q.2d 1848, 1854 (T.T.A.B. 2000) (entering judgment against applicant and refusing registration of the disputed mark).

Respectfully submitted,

Dated: January 15, 2008

By: 

Jeffery A. Handelman  
Thomas M. Williams  
Michael K. Hendershot  
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ATTORNEYS FOR OPPOSER  
V&V SUPREMO FOODS, INC.

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the foregoing  
Opposer's Motion for Judgment was served on Applicant's counsel by electronic mail and  
first class mail, postage prepaid, addressed as follows:

John S. Egbert  
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on January 15, 2008.

A handwritten signature in dark ink, appearing to read "Kevin Wilson", is written over a horizontal line.